

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

----- x
SAMAD BROTHERS, INC.,

Plaintiff,

-- against --

BOKARA RUG CO. INC., JAN SOLEIMANI, and
GABRIEL VAKNIN,

Defendants.
----- x

:
: Case No. 09 Civ. 5843
: (JFK / KNF)

:
: **CORRECTED**
: **NOTICE OF MOTION**
: **FOR SANCTIONS**
: **AND CONTEMPT**

PLEASE TAKE NOTICE that, at the United States Court House, 500 Pearl Street, Courtroom 20A, New York, NY 10007, the undersigned will move this Court pursuant to Rules 37(b) and 70(e) of the Federal Rules of Civil Procedure and Local Rule 83.9, requesting that the Court award plaintiff sanctions and hold defendants in contempt for failing to comply with the Court's orders dated January 24, 2011 and February 10, 2011. Pursuant to Local Rule 6.1(b), opposing affidavits and answering memoranda, if any, shall be served no later than March 7, 2011, and reply affidavits and memoranda of law, if any, shall be served by no later than March 14, 2011.

Dated: New York, New York
February 20, 2011

KAUFMAN & KAHN, LLP

By: /s/ Mark S. Kaufman

Mark S. Kaufman
Attorneys for Plaintiff, Samad Brothers, Inc.
747 Third Avenue, 32nd Floor
New York, NY 10017
Tel.: (212) 293-5556
Email: kaufman@kaufmankahn.com